

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

UNITED STATES OF AMERICA

-v.-

RUSSELL KING,

Defendant.

INDICTMENT

07 Cr.

07 CRIM. 952

COUNT ONE

The Grand Jury charges:

1. From at least in or about August 2004, up to and including in or about December 2004, in the Southern District of New York and elsewhere, RUSSELL KING, the defendant, and others known and unknown, unlawfully, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of this conspiracy that RUSSELL KING, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 50 grams and more of cocaine base in the form commonly known as "crack," in violation of Sections 812, 841(a)(1) and 841(b)(1)(A) of Title 21, United States Code.

OVERT ACTS

3. In furtherance of the conspiracy and to effect its illegal object, the following overt act, among others, was

committed in the Southern District of New York:

a. On or about October 31, 2004, RUSSELL KING, the defendant, and a co-conspirator ("CC-1") not named herein had a telephone conversation regarding a narcotics transaction.

(Title 21, United States Code, Section 846)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney